

1 JARED G. CHRISTENSEN, ESQ.  
2 Nevada State Bar No. 11538  
3 DELEELA M. WEINERMAN, ESQ.  
4 Nevada State Bar No. 13985  
5 BREMER WHYTE BROWN & O'MEARA LLP  
6 1160 N. TOWN CENTER DRIVE  
7 SUITE 250  
8 LAS VEGAS, NV 89144  
9 TELEPHONE: (702) 258-6665  
10 FACSIMILE: (702) 258-6662  
11 jchristensen@bremerwhyte.com  
12 dweinerman@bremerwhyte.com

13 Attorneys for Defendant,  
14 ALLSTATE INSURANCE COMPANY

15 **IN THE UNITED STATES DISTRICT COURT**

16 **DISTRICT OF NEVADA**

17 ASHLEY HERNANDEZ, an individual;  
18 DOMINIC L. WYCKOFF, an individual,

19 Plaintiffs,

20 vs.

21 ALLSTATE INSURANCE COMPANY, a  
22 Foreign Corporation; DOES 1 through 10,  
23 inclusive; and ROE CORPORATIONS 1  
24 through 10, inclusive,

25 Defendants.

26 Case No. 2:23-cv-00405-JAD-BNW

27 **STIPULATION AND ORDER TO  
28 EXTEND DISCOVERY DEADLINES  
(FIRST REQUEST)**

29 Plaintiffs ASHLEY HERNANDEZ and DOMINIC L. WYCKOFF by and through  
30 their attorney of record, Ralph A. Schwartz, Esq. of Ralph A. Schwartz. P.C. and Defendant  
31 ALLSTATE INSURANCE COMPANY by and through its attorneys of record, Jared G.  
32 Christensen, Esq., and Deleela M. Weinerman, Esq. of the law firm Bremer, Whyte, Brown  
33 & O'Meara, LLP, hereby request this Honorable Court to adopt and approve this stipulated  
34 extension to the discovery plan and continue the discovery deadlines for 90-days as requested  
35 herein.

36 ///

37 ///

## I. LOCAL RULE IA 6-1 IS SATISFIED

This is the first request for extension of discovery deadlines filed by the parties.

3 Pursuant to the Discovery Plan and Scheduling Order from April 26, 2023, the following  
4 dates govern for purposes of discovery:

1. Discovery Cutoff Date:	December 4, 2023
2. Initial Expert Disclosure:	October 5, 2023
3. Rebuttal Expert Disclosure:	November 6, 2023
4. Dispositive Motions:	January 18, 2024
5. Joint Pre-Trial Order:	February 19, 2024

Plaintiff Ashley is currently in the process of supplementing her records in relation to a prior 2014 accident. As such the parties need additional time to conduct discovery in preparation for initial expert disclosures. Moreover, additional time is required to conduct any written discovery, schedule depositions and to complete any other additional discovery. Accordingly, the parties are requesting a 90-day extension to all discovery deadlines.

5 The instant request comports with Local Rule IA 6-1, in that no request is being made  
6 after the expiration of the specified period.

## I. LOCAL RULE 26-3 IS SATISFIED

The instant request to extend discovery deadlines satisfies the requisites of Local Rule 26-3. Additionally, good cause exists for the extension. Plaintiff Ashley is currently in the process of supplementing her records in relation to a prior 2014 accident. As such the parties need additional time to conduct discovery in preparation for initial expert disclosures. Moreover, additional time is required to conduct any written discovery, schedule depositions and to complete any other additional discovery. Accordingly, the parties are requesting a 90-day extension to all discovery deadlines.

Listed below is a statement specifying the discovery completed in this case:

6	Plaintiffs' Initial Disclosures	May 10, 2023
7	Defendant's Initial Disclosures	June 16, 2023

1	Defendant's First set of Written	June 16, 2023
2	Discovery Plaintiffs	
3	Defendant's First Supplemental	June 20, 2023
4	Disclosures	
5	Plaintiffs' Responses to Defendant's	July 14, 2023
6	First Set of Written Discovery	

7                 The parties are requesting an additional 90-days be afforded for discovery. The  
 8 following deadlines are requested.

- |    |                                  |                  |
|----|----------------------------------|------------------|
| 9  | 1. Discovery Cutoff Date:        | March 4, 2024    |
| 10 | 2. Expert Designations:          | January 4, 2024  |
| 11 | 3. Rebuttal Expert Designations: | February 5, 2024 |
| 12 | 4. Dispositive Motions:          | April 3, 2024    |
| 13 | 5. Joint Pre-Trial Order:        | May 3, 2024      |

14                 The parties hereby stipulate to the proposed changes in the discovery deadlines.

15  
 16 DATED this 7<sup>th</sup> day of September 2023

17 **BREMER WHYTE BROWN &**  
**O'MEARA LLP**

18  
 19 /s/ Deleela M. Weinerman  
 Jared G. Christensen, Esq.  
 Nevada State Bar No. 11538  
 20 Deleela M. Weinerman, Esq.  
 Nevada State Bar No. 13985  
 21 *Attorneys for Defendant,*  
*Allstate Insurance Company*

DATED this 7<sup>th</sup> day of September 2023

**RALPH A. SCHWARTZ, P.C.**

---

/s/ Ralph A. Schwartz  
 Ralph A. Schwartz, Esq.  
 Nevada State Bar No. 5488  
*Attorney for Plaintiffs,*  
*Ashley Hernandez and*  
*Dominic L. Wyckoff*

1

ORDER

2

IT IS SO ORDERED:

3



4

5

UNITED STATES MAGISTRATE JUDGE

6

7

Dated: 09/12/2023

8

9

10 The STIPULATION AND ORDER TO EXTEND DISCOVERY (FIRST

11 REQUEST) in 2:23-cv-00405-JAD-BNW was submitted by:

12 BREMER WHYTE BROWN & O'MEARA LLP

13 By: /s/ Deleela M. Weinerman

14 Jared G. Christensen, Esq.  
Nevada State Bar No. 11538  
15 Deleela M. Weinerman  
Nevada State Bar No. 13985  
16 Attorneys for Defendant,  
*Allstate Insurance Company*

17

18

19

20

21

22

23

24

25

26

27

28